

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

|                          |   |                                  |
|--------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA | ) | CRIMINAL NO.: 4:22-cr-00140-JD-1 |
|                          | ) |                                  |
| vs.                      | ) |                                  |
|                          | ) |                                  |
| MOHAMMAD RIBHI FARRAJ    | ) |                                  |

**MOTION FOR PRELIMINARY ORDER OF FORFEITURE**  
**AS TO MOHAMMAD RIBHI FARRAJ**

Pursuant to Fed. R. Crim. P. 32.2(b), the United States of America, by and through its undersigned Assistant United States Attorney, Carrie Fisher Sherard, moves this Court for the entry of a Preliminary Order of Forfeiture as to Mohammad Farraj, ("Farraj", "Defendant"), based on the Defendant's conviction of conspiracy to commit wire fraud related to Unemployment Insurance programs in New York, Florida, and South Carolina, in violation of Title 18, United States Code, Sections 1343 and 1349.

The Government further requests that such order be entered by this Court sufficiently in advance of sentencing to permit time for the Government and the Defendant to suggest revisions or modifications. Fed. R. Crim. P. 32.2(b)(2)(B) ("Unless doing so is impractical, the court must enter the preliminary order sufficiently in advance of sentencing to allow the parties to suggest revisions or modifications before the order becomes final as to the defendant under Rule 32.2(b)(4).")

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

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